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7 *Attorneys for Defendant*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 YESENIA LARA, aka YESENIA
NOLASCO VARGAS,
11 Plaintiff,
12 v.
13 UNITED STATES OF AMERICA;
ALEJANDRO MAYORKAS, in his
Official Capacity, Secretary, Department of
Homeland Security; MERRICK
GARLAND, in is Official Capacity,
Attorney General, Department of Justice;
TAE D. JOHNSON, in his Official
Capacity, Acting Director of U.S.
Immigration and Customs Enforcement;
UR MENDOZA JADDOU, in her Official
Capacity, Director of U.S. Citizenship and
Immigration Services,
14 Defendants.

15 Case No. 2:21-cv-01845 -JCM-BNW

16 **Stipulation and Order for Extension
of Time**
17 **(Second Request)**

22 Plaintiff YESENIA LARA, and Defendant UNITED STATES OF AMERICA;
23 ALEJANDRO MAYORKAS, in his Official Capacity, Secretary, Department of
24 Homeland Security; MERRICK GARLAND, in is Official Capacity, Attorney General,
25 Department of Justice; TAE D. JOHNSON, in his Official Capacity, Acting Director of
26 U.S. Immigration and Customs Enforcement; and UR MENDOZA JADDOU, in her
27 Official Capacity, Director of U.S. Citizenship and Immigration Services, hereby stipulate

1 and agree that Defendants may have a 28-day extension of time, from December 28, 2021
2 to January 25, 2022, to respond to Plaintiff's Complaint For Declaratory and Injunctive
3 Relief (ECF No. 1).

4 Plaintiff is in the process of obtaining her certificate of citizenship, which will cause
5 this case to be moot. Moreover, defense counsel's calendar is busier than normal with
6 upcoming hearings and multiple filing deadlines in several cases, including two before the
7 Ninth Circuit. Under the circumstances, good cause exists to extend the deadline for
8 Defendants to respond to Plaintiff's Complaint For Declaratory and Injunctive Relief. *See*
9 Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the
10 court may, *for good cause*, extend the time...with or without motion or notice if the court
11 acts, or if a request is made, before the original time or its extension expires[.]") (emphasis
12 added).

13 This is Defendants' second request for an extension of time. *See* LR IA 6-1(a) (must
14 advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this
15 extension request, and he has advised that he does not oppose the request. This stipulation
16 is made in good faith and not for the purpose of undue delay.

17 DATED: December 28, 2021

18 CHRISTOPHER CHIOU
Acting United States Attorney

19
20 /s/ Xavier Gonzales
XAVIER GONZALES
21 Attorney for Plaintiff

/s/ Holly A. Vance
HOLLY A. VANCE
Assistant U.S. Attorney
22 Attorney for Defendant

23 IT IS SO ORDERED.

24 Dated: December 29, 2021

25 
26 UNITED STATES MAGISTRATE JUDGE
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